

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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DOUGLAS J. HORN and CINDY HARP-HORN,

Plaintiffs,

Civil Action No:
15-cv-701 (FPG)

-against-

**PLAINTIFF’S SUBSTANTIVE
JURY INSTRUCTIONS**

MEDICAL MARIJUANA, INC.,
DIXIE ELIXIRS AND EDIBLES,
RED DICE HOLDINGS, LLC, and
DIXIE BOTANICALS,

Defendants,

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Pursuant to the Final Pre-Trial Order, Plaintiff submits the following substantive Jury Instructions to the Court and the Parties:

RICO 18 U.S.C. § 1962(c) – Matthew Bender’s Modern Federal Jury Instructions - Civil

- Instruction 84-21 The Complaint and the Statute
- Instruction 84-22 Prejudice from the Word “Racketeering”
- Instruction 84-23 Elements
- Instruction 84-24 First Element—The Enterprise
- Instruction 84-25 Second Element—Effect on Interstate Commerce
- Instruction 84-26 Third Element—Association With the Enterprise
- Instruction 84-27 Fourth Element—Engaging in a Pattern of Racketeering Activity
- Instruction 84-28 Fourth Element—Unanimity on Racketeering Acts
- Instruction 84-29 Fifth Element—Conducting or Participating in the Enterprise
“Through” the Pattern of Racketeering
- Instruction 84-30 Causation
- Instruction 84-31 Damages

and

Fraud – New York Pattern Jury Instructions

Instruction 3:20 – Fraud and Deceit – Inducement

Instruction 3:20.2 – Fraud and Deceit - Omission

Damages – New York Pattern Jury Instructions

Instruction 2:278 – Punitive Damages

and the Special Verdict Form for 2:278, SV-1 and SV-II as applicable.

Dated: New York, New York
June 29, 2021

Respectfully Submitted,

THE LINDEN LAW GROUP, P.C.

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